

Arthur Neal, USDA – NOP
NOSB Sunset Review
1400 Independence Ave. SW, Room 4008
Ag. Stop 0268
Washington, DC 20250-0200

Nov. 10th, 2005

Dear NOSB Members and USDA Staff;

Oh, Oh Organic is a certified organic warehouse-distribution center in which ingredients are re-packed and sold to manufacturers. The materials listed below are components or safety tools (for sanitation) in products we sell that are certified organic. The loss of these materials, either as a processing aid or as an ingredient, would be a detriment to our ability to offer safe and effective organic ingredients.

Oh, Oh Organic requests that these materials be re-affirmed for use in handling in the USDA – NOP regulation under 205.605. **For each of these materials:**

- 1 - the TAP review is available through OMRI,
- 2 - additional information about the material review process may be found at the NOSB archive web site,
- 3 – these materials are allowed for organic handling/processing in Japan and the EU organic regulations,
- 4 – these materials were allowed by private organic certifiers for approximately 10 years prior to the implementation of the USDA-NOP 7 CFR, Part 205.

Name of Substance:	NOP Listing:	Reasons for continued use:	Documentation:
Glycerin	205.605 b	This material functions as a humectant. There is no organic version. This material (from vegetable/animal sources made by hydrolysis) is not a known toxin nor detrimental to human health.	The original NOSB vote to list this product as “allowed” was 14 to 0. This material was TAP reviewed and this review was considered by the NOSB, forwarded with the above vote to USDA- NOP. It was listed in the Federal Register/Vol. 65, No. 246/Thursday, December 21, 2000/Rules and Regulation.
Xanthan Gum	205.605 b	This material functions as a stabiliser and thickener. There is no organic version.	The original NOSB vote to list this product as “allowed” was 12 to 2. This material was TAP reviewed and this review was considered by the NOSB, forwarded with the above vote to USDA- NOP. It was

		This material (from vegetable sources) is not a known toxin nor detrimental to human health.	listed in the Federal Register/Vol. 65, No. 246/Thursday, December 21, 2000/Rules and Regulation.
Chlorine (including: (i) Calcium hypochlorite (ii) Chlorine dioxide (iii) Sodium hypochlorite)	205.605 b	This material functions as a sanitizer and sterilizer. There is no organic version. All residue can be rinsed off of equipment prior to organic processing.	The original vote to list this product as “allowed” was 9 to 2. This material was TAP reviewed and this review was considered by the NOSB, forwarded with the above vote to USDA- NOP. It was listed in the Federal Register/Vol. 65, No. 246/Thursday, December 21, 2000/Rules and Regulation.
Sodium Bicarbonate	205.605 a	This material functions as a leavening and as a pH buffer. There is no organic version. This material is not a known toxin nor detrimental to human health.	The original vote to list this product as “allowed” was 14 to 0. This material was TAP reviewed and this review was considered by the NOSB, forwarded with the above vote to USDA- NOP. It was listed in the Federal Register/Vol. 65, No. 246/Thursday, December 21, 2000/Rules and Regulation.

Respectfully,

Gay Timmons, President
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